

1 Michele R. Stafford, Esq. (SBN 172509)
2 Adrian L. Canzoneri, Esq. (SBN 265168)
3 SALTZMAN & JOHNSON LAW CORPORATION
4 44 Montgomery Street, Suite 2110
5 San Francisco, CA 94104
6 (415) 882-7900
7 (415) 882-9287 – Facsimile
8 mstafford@sjlawcorp.com
9 acanzoneri@sjlawcorp.com

10 Attorneys for Plaintiffs

11 Jeffrey S. Kaufman, Esq. (SBN 122569)
12 Susan E. Bishop, Esq. (SBN 187253)
13 BERLINER COHEN, LLP
14 Ten Almaden Blvd., 11th Floor
15 San Jose, CA 95113
16 (408) 286-5800
17 (408) 998-5388 – Facsimile
18 jsk@berliner.com
19 susan.bishop@berliner.com

20 Attorneys for Defendants

21 UNITED STATES DISTRICT COURT

22 FOR THE NORTHERN DISTRICT OF CALIFORNIA

23 RUSSELL E. BURNS, et al.,

24 Case No.: 3:15-cv-00385-VC

25 Plaintiffs,

26 **JOINT STIPULATION TO CONTINUE
CASE MANAGEMENT CONFERENCE
AND TO SET MEDIATION DEADLINE;
[PROPOSED] ORDER THEREON**

27 v.

28 G.R. CLARK, INC., a California corporation;

29 GORDON RAYMOND CLARK, an

30 Individual; and DENNIS GORDON CLARK,
31 an Individual,

32 Date: June 16, 2015

33 Time: 10:00 a.m.

34 Dept.: Courtroom 4, 17th Floor

35 450 Golden Gate Ave.

36 San Francisco, CA

37 Judge: Honorable Vince Chhabria

38 Defendants.

39 Plaintiffs and Defendants, by and through their respective counsel of record, hereby
40 respectfully request that the Case Management Conference, currently scheduled for June 16, 2015,
41 in the above-captioned Court, be continued for approximately ninety (90) days, or as soon
42 thereafter as may be convenient for the Court. GOOD CAUSE exists for the requested
43 continuance as follows:

44
45 **JOINT STIPULATION TO CONTINUE CASE MANAGEMENT CONFERENCE; [PROPOSED] ORDER
46 CASE NO.: C15-00385 VC**

1 1. As the Court's records will reflect, this action was filed by Plaintiffs on January 27,
 2 2015 [Dkt. No. 1] to compel Defendants' compliance with its obligations to pay monthly
 3 employee contributions to Plaintiffs, along with payment of amounts found due in an audit
 4 inspection of Defendants' payroll records, pursuant to Defendants' Collective Bargaining
 5 Agreement.

6 2. Defendants filed an Answer to the Complaint on February 25, 2015 [Dkt. No. 14].

7 3. On May 15, 2015, Defendants served their first set of Requests for Production of
 8 Documents (the "Requests") on Plaintiffs. Plaintiffs are currently in the process of gathering any
 9 documents responsive to Defendants' Requests, and counsel for the parties have agreed on a
 10 production date of no later than June 19, 2015.

11 4. In addition, on June 3, 2015, counsel for the parties participated in an ADR Phone
 12 Conference with Howard Herman, Director of the Court's ADR Program. During the
 13 aforementioned ADR Conference, counsel for the parties agreed to mediate this matter by
 14 **September 1, 2015**. This allows Defendants ample time to receive and review the documents
 15 produced by Plaintiffs in response to Defendants' Requests, and allows the parties to further their
 16 discussions towards resolution of the matter outside of litigation.

17 5. Thus, the parties jointly request a continuance of the Case Management Conference
 18 so as to allow the parties to facilitate the production of documents, and to further facilitate
 19 settlement of this matter, either informally or through mediation by the September 1, 2015
 20 deadline. Both parties desire to resolve this matter without the need for further and unnecessary
 21 litigation.

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1 6. There are no issues that need to be addressed by the parties at the currently
2 scheduled Case Management Conference. In the interest of conserving costs, as well as the
3 Court's time and resources, Plaintiffs and Defendants jointly and respectfully request that the Case
4 Management Conference, currently scheduled for June 16, 2015, be continued for approximately
5 ninety (90) days, to allow sufficient time for the parties to continue their attempts to resolve this
6 matter outside of litigation.

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8 **SO STIPULATED.**

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Dated: June 3, 2015

SALTZMAN & JOHNSON
LAW CORPORATION

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By: _____/S/ _____
Adrian L. Canzoneri
Attorney for Plaintiffs

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Dated: June 3, 2015

BERLINER COHEN

By: _____/S/ _____
Susan E. Bishop,
Attorney for Defendants

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IT IS SO ORDERED.

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Date: _____ UNITED STATES DISTRICT JUDGE

1 6. There are no issues that need to be addressed by the parties at the currently
2 scheduled Case Management Conference. In the interest of conserving costs, as well as the
3 Court's time and resources, Plaintiffs and Defendants jointly and respectfully request that the Case
4 Management Conference, currently scheduled for June 16, 2015, be continued for approximately
5 ninety (90) days, to allow sufficient time for the parties to continue their attempts to resolve this
6 matter outside of litigation.

7

8 **SO STIPULATED.**

9 Dated: June 3, 2015

SALTZMAN & JOHNSON
LAW CORPORATION

11 By: 

12 Adrian L. Canzoneri
13 Attorney for Plaintiffs

14 Dated: June 3, 2015

15 BERLINER COHEN , LLP

16 By: 

17 Susan E. Bishop,
18 Attorney for Defendants

19 **IT IS SO ORDERED.**

20 Based on the foregoing, and GOOD CAUSE APPEARING, the currently set Initial Case
21 Management Conference is hereby continued to 9/29/2015, at 10:00 AM. All related
22 deadlines are extended accordingly.

23 Date: June 5, 2015

24 
25 UNITED STATES DISTRICT JUDGE

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